

1 STEWART TITLE & ESCROW, INC.
2 10505 JUDICIAL DRIVE, STE. 300
3 FAIRFAX, VIRGINIA 22030
4

5 UNITED STATES BANKRUPTCY COURT
6 EASTERN DISTRICT OF VIRGINIA
7 RICHMOND DIVISION

8 IN RE: Amy Fay Robinson

9 Debtor(s)

10 Plaintiffs,

11 v.

12 JP Morgan Chase Bank, N.A.
13 P.O. Box 182106
14 Columbus, OH 43218-2106

15 Stewart Title & Escrow, Inc.
16 10505 Judicial Dr., Ste. 300
17 Fairfax, VA 22303

Case No. 11-31815-KRH

AP Case No.: 13-03057-KRH

STIPULATION FOR NON-MONETARY
JUDGMENT AS TO DEFENDANT
STEWART TITLE & ESCROW, INC.

18 Plaintiff AMY FAY ROBINSON ("Plaintiff"), and Defendant STEWART TITLE &
19 ESCROW, INC. ("ST&E"), through their respective counsels, enter into this stipulation.

20 **RECITALS**

- 21 1. Plaintiff filed her complaint on March 15, 2013 to determine the validity, extent, and
22 priority of liens, and further relief as the nature of the case may require in Virginia.
23 2. Defendant ST&E's sole interest in the Property herein arises from its alleged capacity as
24 trustee of a particular deed of trust (the "Deed of Trust") referenced in Paragraph No. 7 in
25 Plaintiff's Complaint.

26 **STIPULATION**

- 27 1. Plaintiff acknowledges and stipulates that ST&E has been named as a defendant in this
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litigation solely in their alleged capacity as trustees under the Deed of Trust referenced in Paragraph No. 7 of Plaintiff's Complaint and that ST&E has not been named as a defendant due to any acts or omissions on their part in the performance of their duties as trustee.

2. ST&E has not been involved in any way with the subject loan, the Deed of Trust, or the Property encumbered thereby, except in their capacity as the trustee under the Deed of Trust.

3. ST&E agrees to be bound by whatever order or judgment is issued by the Court relating to the Deed of Trust, and shall not be subject to any monetary awards for damages, attorney's fees or costs.

4. ST&E will not be required to participate further in this action, will not be required to respond to any of the pleadings in this action, and will not be required to appear at any hearings or the trial of this action, but will be required to respond to any discovery requests as a nonparty.

5. The filing of this Stipulation is not intended to and does not prejudice the rights of any trustor, beneficiary, or assignee under the Deed of Trust, and shall not constitute a waiver of any other person or entity's rights or obligations under the Deed of Trust.

6. This Stipulation shall inure to the benefit of the parties and their successors and/or assigns.

IT IS SO STIPULATED.

DATED: MAY ___, 2013

AMY FAY ROBINSON

BY: /s/ ROGER C. HURWITZ

DATED: MAY ___, 2013

STEWART TITLE & ESCROW

BY: /s/ SEAN O'CALLAGHAN
LITIGATION COUNSEL